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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JONATHAN SAPAN,

Plaintiff,

vs.

SOLARMAX TECHNOLOGY, INC., a  
California Corporation; and DAVID HSU,  
an individual,

Defendants.

Case No: 15-cv-00897 MMA MDD

**JOINT MOTION TO DISMISS  
ENTIRE CASE WITH  
PREJUDICE**

By and through their respective counsels, Plaintiff JONATHAN SAPAN and all Defendants (SOLARMAX TECHNOLOGY, INC. and DAVID HSU) give the Court notice that they have settled this matter in its entirety and they therefore jointly move and hereby stipulate to the dismissal, with prejudice, of Plaintiff's Complaint pursuant to Federal Rule of Civil Procedure 41(a). A proposed order reflecting the dismissal is provided.

1 DATED: September 15, 2015

**PRATO & REICHMAN, APC**

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4 /s/Christopher J. Reichman, Esq.  
5 By: Christopher J. Reichman, Esq.  
6 **Prato & Reichman, APC**  
7 Attorneys for Plaintiff  
8 JONATHAN SAPAN

9 DATED: September 15, 2015

10 /s/Matthew Gorman  
11 By: Matthew Gorman  
12 Attorneys for Defendants  
13 SOLARMAX TECHNOLOGY, INC.  
14 and DAVID HSU  
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**ATTESTATION**

I hereby attest that Matthew Gorman has given me approval to file this Joint Motion To Dismiss. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: September 15, 2015

**PRATO & REICHMAN, APC**

/s/Christopher J. Reichman, Esq.  
By: Christopher J. Reichman, Esq.  
**Prato & Reichman, APC**  
Attorneys for Plaintiff  
JONATHAN SAPAN

**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing instrument was served upon all counsel of record in the above entitled and numbered cause on September 15, 2015.

  X   Via ECF

Matthew Gorman, Esq.  
Attorneys for Defendants  
SOLARMAX TECHNOLOGY, INC.  
and DAVID HSU  
mgorman@gormanfirm.com

DATED: September 15, 2015

**PRATO & REICHMAN, APC**

/s/Christopher J. Reichman, Esq.  
By: Christopher J. Reichman, Esq.  
**Prato & Reichman, APC**  
Attorneys for Plaintiff  
JONATHAN SAPAN